United States Court of Appeals

for the Second Circuit

APPELLANT'S REPLY BRIEF

77-2041 SEP 6 1977

UNITED STATES COURT OF APPEALS

FOR THE SECOND CIRCUIT

Docket No. 77-2041

PLEASE RETURN TO
RECORDS ROOM

GAYLORD W. ANGUISH,

Appellabt

-against-

UNITED STATES OF AMERICA,

Appellee

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF NEW YORK

APPELLANT'S TRAVERSE TO THE APPELLEE'S RETURN

GAYLORD W. ANGUISH
PRO SE
LEWISBURG, PA. 17837

APPELLANT'S TRAVERSE

The Appellee's Brief in rebuttal to Appellant's Brief is herein denied in whole by the Appellant.

The proper method of such denial would be to respond in fashion. However, the substance of the Appellee's Brief is so pot-marked with discrepancies that it can only be representative of stupidity or direct attempt at dishonesty. A rebuke is the only answer that the brief calls for and with the knowledge by the Appellant that legal protocol disallows this, Appellant must, in the pure sense of sanity, rebuke.

The Appellant is guilty of the act of bank robbery in so much as he did rob a bank. He is aware of it even though he has no memory of the act. Thusly, the question before the Court is not guilt, rather it is a question of CONSTITUTIONALITY (being basic building blocks), improper government procedures, and of truth.
When the government contends that the Appellant was not on PROBATION, was not an IN-PATIENT in either hospital, was not out of the custody of the U.S. Marshal, did not properly bring points on appeal, and was sentenced to prison or to the custody of the Attorney General the Appellee is in fact violating all the constitutional

rights and safeguards of the Appellant, violating governmental procedures and bending to less that is far from the truth. Appellant is the government, as are you, and for this blatant denial of the Appellant's situation to be allowed does nothing but take something from all of us. From the Appellant, time and mental condition. From us all, the freedom of our heirs. As for the actions of the government thus far, Appellant can only say that he has lost years (amnesia) of his life because the court, U.S. Attorney, and the prison system have failed to give the proper light to all the psychiatric reports which they themselves demanded, simply because the reports may have been slightly tilted away from one more assembly line conviction and maybe in the direction of truth.

The Appellant is idealistic enough to have thought that upon submission to the courts, to the doctors they provided, that he would gain as would society. Up to this month of September, 1977, the Appellant has had a difficult time in knowing what difference there be (if any) between the convicted drug pusher locked in the room down the hall from him in Lewisburg Penitentiary and the human spokes of the Judicial System. Appellant did expect the drug pusher to deny ever dealing in drugs but he didn't expect the government to be so caught up in it's cloak of rightousness that it

fails to recognize that it had indeed placed the appellant on probation and has illegally placed the Appellant in prison. No where in any court hearing or action in which the Appellant was present has other than "10 YEARS" been mentioned. For the government to say they made a mistake by using a past conviction in their case to convict because the conviction was overturned and not guilty entered would be proper. For them to deny is but egotistical and socially defeating and there are men in prison who have played lesser games and are being punished.

Appellant's contention in relationship to the points that the appellee failed to confront in it's brief is that there is no basis for contention and that the points are with merit.

Appellant contends that the substance of the government's case is without merit and that Appellant's requested relief be granted.

Respectfully submitted

Gaylord W. Anguish
Pro Se

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 3 DAY OF SEPTEMBER, 1977.

John Smith

CERTIFICATE OF SERVICE

I, Gaylord W. Anguish, the Appellant hereby certifies that I have served a true and correct copy of the foregoing Traverse upon the U.S. Attorney, David G. Trager, Eastern District Of New York, 225 Cadman Plaza East, Brooklyn, New York via the United States Mail from the United States Penitentiary at Lewisburg, Pa. 17837.

GAYLORD W. ANGUISH
Pro Se

SUBSCRIBED AND SWORN TO BEFORE ME
THIS 2 DAY OF SEPTEMBER, 1977.

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